



Stephen Hoffman

From: ecomment@pa.gov
Sent: Tuesday, January 5, 2021 2:54 PM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 8 (1pm) - #7-559
Testimony date: 12/11/2020 12:00:00 AM
Testimony location: WebEx

Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

Will Bernstein
 National Resource Defense Council (wbernstein@nrdc.org)
 371 44th St
 Pittsburgh, PA 15201 US

Comments entered:

My name is Will Bernstein – I am a longtime resident of Pittsburgh, and am currently serving as Climate Advisor to the City of Pittsburgh, as part of the American Cities Climate Challenge. Along with Philadelphia and 23 other cities across the U.S., our city has made a commitment to substantially reduce emissions of greenhouse gases by 2030. Through the challenge, and with its ambitious Climate Action Plan, Pittsburgh seeks a 50% reduction in carbon emissions by 2030, through a mix of improved energy efficiency in buildings, increased renewable energy generation, reductions in motor vehicle miles traveled, and the broader adoption of electric vehicles. Pennsylvania’s participation in RGGI is critical to Pittsburgh’s climate action for two reasons:

First, although we are making progress in the adoption of more energy efficient technologies in buildings and transportation, without a cleaner electric grid, we will not be able to make the emissions reductions needed to stop catastrophic climate change. With Pennsylvania’s participation in RGGI expected to reduce carbon emissions by over 180 million tons by decade’s

end, this program really is essential for meeting our climate goals.

Secondly, and perhaps even more importantly, participation in RGGI, if done right, can help ensure that these necessary climate actions are carried out in an equitable way that grows the economy while providing support for the communities and people that have been most affected by air pollution and will most acutely suffer the effects of climate change. In Allegheny County for example, we know that black children are hospitalized for asthma at a rate six times higher than white children. This fact is shocking, but is not surprising given how frequently the County's predominantly black neighborhoods are also the places with the highest concentrations of criteria pollutants. We also know that the Pittsburgh region has some of nation's highest energy costs relative to income. Due to our aging housing stock, which is frequently uninsulated and lacking in the latest energy efficient technologies, heating and cooling those homes is much too expensive. This energy burden is particularly acute among minority households – in fact Pittsburgh has the second highest energy burden for minority households of any city in the country.

In each of these cases, there is an opportunity to invest the proceeds of emissions allowance auctions under RGGI in a way that further reduces carbon emissions while simultaneously addressing the stark racial disparities that exist in Pittsburgh and across the Commonwealth, and to complement and enhance the climate work being done by cities. Residential energy efficiency is a good example – residences are responsible for 25% of Pittsburgh's carbon emissions, and while there are groups doing good work in helping to modernize homes, it is not something we have been able to do at scale.

These investments could also focus on lowering emissions from smaller industrial sources and from the transportation sector (especially diesel fueled heavy trucks and buses), as these are major contributors to poor air quality in low income and minority neighborhoods, and while they aren't addressed by caps on power sector emissions, they make up another quarter of Pittsburgh's carbon emissions.

I would also urge DEP to keep an eye toward equity when assessing the success of RGGI implementation. The experience of carbon capping programs in other states has shown that it is possible for overall emissions to decrease while carbon and criteria pollution actually increase in low income and minority communities. It is imperative that Pennsylvania's RGGI be structured and monitored so that this does not happen.

Finally, I would like to express my support for the equity principles advanced by the Department's Environmental Justice Advisory Board, and to commend DEP for explicitly seeking input addressing equity and environmental justice as a part of this process – I hope my comments have offered a few useful examples of how these important goals can be addressed. Thank you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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